

LITTLER MENDELSON

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Attorneys for Defendant
Waste Management of New Jersey, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TEAMSTERS-EMPLOYERS LOCAL 945
PENSION FUND,

-and-

TRUSTEES OF TEAMSTERS-EMPLOYERS
LOCAL 945 PENSION FUND,

Plaintiffs,

vs.

WASTE MANAGEMENT OF NEW JERSEY,
INC.,

Defendant.

Civil Case No. 2:11-cv-00902 (FSH)(PS)

**DEFENDANT'S NOTICE OF
MOTION FOR ATTORNEY'S FEES**

Oral Argument Requested

TO: John M. Agnello
Melissa E. Flax
Carella, Byrne, Cecchi, Olstein, Brody &
Agnello, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068-1739
Attorneys for Plaintiffs

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919 Third Avenue
New York, NY 10022
Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on July 18, 2011, the undersigned attorneys for defendant Waste Management of New Jersey, Inc. ("Defendant"), will move before the Honorable Faith S. Hochberg, U.S.D.J., of the United States District Court for the District

of New Jersey, M.L. King, Jr. Federal Building & Courthouse, Newark, New Jersey, at _____ a.m. / p.m. or as soon thereafter as counsel may be heard, for an Order pursuant to Federal Rule of Civil Procedure 54(d)(2), Rule 54.2 of the Local Civil Rules of the United States District Court for the District of New Jersey, and 29 U.S.C. § 1132(g)(1), awarding attorney's fees to Defendant in the amount of \$34,225.00.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, the undersigned attorneys for Defendant will rely on Defendant's Memorandum of Law and Affidavit of Susan Katz Hoffman, Esq., and exhibits appended thereto.

A proposed form of Order is enclosed herewith.

/s/ Frank A. Custode

Frank A. Custode
Susan Katz Hoffman (*pro hac vice*)
Deidre A. Grossman (*pro hac vice*)
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendant
Waste Management of New Jersey, Inc.

Dated: June 16, 2011